POSITION

AD/BR10214/FSO

Brussels, 5 November 2025

The European Commission Roadworthiness Package

IRU position on the new Roadworthiness Package

I. IRU POSITION

IRU welcomes the European Commission's Roadworthiness Package as a timely and forward-looking initiative to integrate emerging vehicle technologies in periodic technical inspections (PTIs) and roadside inspections (RSIs), enhance digitalisation of vehicle documentation, and promote cross-border data exchange as key elements supporting a more efficient and future-proof regulatory framework.

IRU has identified several elements in the proposal which could be further improved:

1. Periodic roadworthiness tests (PTI) for motor vehicles and their trailers

- **Frequency and features of testing**. The proposal risks to discriminate zero-emission light-duty vehicles and lacks alignment between emission and other tests. Emission tests for N1 vehicles (vehicles used for the carriage of goods and having a maximum mass not exceeding 3.5 tonnes) should only be done after four years from first registration. N1 zero-emission vehicles (ZEVs) should be considered up to 4.25 tonnes instead of 3.5 to avoid subjecting them to the testing rules for heavier vehicle categories. Greater harmonisation of testing intervals across Member States is needed.
- **New testing requirements.** The proposal could create new bottlenecks for vehicle testing. Member States must ensure sufficient testing capacity and trained personnel to meet expanded PTI requirements. The proposal should also introduce a specialised regime for hydrogen vehicles, enforce fuel quality standards to ensure fair emissions testing and establish an aligned EU-wide approach to assess BEV battery performance during PTIs. Indicators should be defined to assess when a low performing battery impacts road safety, and consistent inspection rules should be ensured across Member States to reduce regulatory uncertainty.
- **Follow-up on deficiencies**. The proposal should improve the flexibility to allow rectification and testing either in the Member State that requested the suspension or in the Member State of registration as in the current rules. A clear and reasonable timeframe must be set for issuing a new roadworthiness certificate once deficiencies are resolved.
- **Validity of roadworthiness certificates obtained after a temporary suspension**. The proposal should ensure a full 12-month validity of any roadworthiness certificate obtained following the temporary suspension – regardless of the reason – of the registration or roadworthiness certificate, for vehicles of categories M2, M3, N2, N3, O3 and O4.
- **Crisis situations.** The proposal introduces provisions for crisis situations but fails to define the minimum PTI requirements that must be maintained during such periods to ensure a consistent level of road safety. Clear EU-level criteria for extending roadworthiness certificate validity during crises and harmonise contingency protocols to safeguard continuity of transport operations across Member States should be introduced.

2. Technical roadside inspection of the roadworthiness (RSI) of commercial vehicles

– **Targets.** The targets set in proposal are based on quantity rather than on risk or intelligence. Realistic and proportionate targets for remote sensing and roadside inspections, aligned with Member States' enforcement capacities, should be set. Follow-up testing to be limited to intelligence-led and risk-rating based inspections, with clear rules on infringement interpretation, sanctions, and liability.

– **Remote sensing**. The proposal is too ambitious on the new requirements for remote testing. Remote sensing technologies should be introduced gradually, with tested deployment, clear technical standards, and proper training. Follow-up inspections should be based on harmonised criteria. Rules for data collection, storage, and exchange must be harmonised. Mandatory notification and warning system should be established.

– **Mandatory inspection of cargo securing**. The proposal makes cargo securing checks mandatory without comprehensive EU rules on the matter. The current rules should be maintained, while developing harmonised EU rules to limit Member States' discretion, preventing legal fragmentation.

3. Vehicle registration documents and recorded data proposal

– **Harmonisation and standardisation of registration certificates**. The proposal establishes the mutual recognition of registration certificate in both a physical or digital format, without aligning the formats and data categories across Member States. Formats and data categories should be fully harmonised across Member States, ensuring consistency.

– **Introduction of mobile registration certificates.** The proposal introduces mobile registration certificates, without indicating backup measures in case of issues. Member States' enforcement authorities and PTI centres should have access to registration certificates, with reliable backup systems to guarantee continuity in case of digital access issues.

4. Improving digitalisation via MOVE-HUB

– The proposal introduces a new network for enforcement-related information exchange. Full interoperability of digital platforms for harmonised risk-rating data and thorough assessment of existing systems before transitioning to MOVE-HUB to be ensured. A realistic implementation period of at least two/three years to be allowed to Member States.

5. Issues not addressed by the Package

– Unfortunately, the proposal does not address some key issues. Measures are needed to minimise RSI duration, especially for passenger transport, through practical solutions like terminal-based checks and common control documents. Investment in safe, well-equipped RSI areas along the TEN-T network is essential. It is also essential to minimise operational downtime for vehicles undergoing PTIs to avoid inspection-related delays.

II. ANALYSIS

On 24 April 2025, the European Commission (EC) presented its new Roadworthiness Package to amend the existing Directives 2014/46/EU on vehicle registration documents (2025/0096 (COD)), 2014/45/EU on periodic roadworthiness tests (2025/0097 (COD)), and 2014/47/EU on technical roadside inspections for commercial vehicles (2025/0097 (COD)). The Package aims to modernise the existing rules and to further enhance road safety through a significant reduction in the number of road fatalities and serious injuries on the road. It lays the groundwork for a more efficient and

future-proof regulatory framework covering vehicle registration, roadworthiness testing, and enforcement procedures for commercial vehicles.

The proposal on vehicle registration documents will replace Directive 2014/46/EU and aims to gradually digitalise the registration documents, to enable real-time data exchange among Member States, and to support mutual recognition of registration documents. The proposal on periodic testing (PTIs) and roadside checks (RSIs) adapts PTIs to electric vehicles and emerging technologies like Advanced Driver Assistance Systems (ADAS), introduces enhanced emissions testing, and improves digitalisation and cross-border data sharing. RSI provisions are expanded to include remote sensing for emissions and noise pre-screening, mandatory cargo securing checks, and increased inspection targets. Vans (N1), cars, and motorcycles are now included in the scope.

IRU welcomes the European Commission's Roadworthiness Package as a timely and constructive step toward modernising the current rules and strengthening road safety across the EU. Whereas the integration of emerging vehicle technologies into periodic technical inspections (PTIs) and roadside inspections (RSIs), alongside enhanced digitalisation of vehicle documentation and cross-border data exchange is positive, it will require considerable commitment from Member States to implement and it could entail additional costs for the commercial road transport operators and Member States.

Some provisions of the proposal could be further improved, as several critical concerns remain unaddressed, particularly regarding harmonisation, operational and implementation feasibility, and the negative impact of certain provisions on commercial road transport operators.

1. Periodic roadworthiness tests for motor vehicles and their trailers

a) Frequency and features of testing – use of zero-emission vehicles should be enabled

IRU regrets that the new proposal fails to acknowledge the impact of current zero-emission vehicle (ZEV) technology on vehicle design and classification. Due to their heavier technology components (e.g. batteries), N1 ZEV may exceed the 3.5-tonne threshold and be reclassified as N2, subjecting them to a more demanding testing regime than their internal combustion engine (ICE) N1 counterparts. IRU stresses the need for more enablers for the use of zero-emission vehicles, N1 ZEV should be considered up to 4.25 tonnes instead of 3.5 tonnes.

In addition, an incentive is created for the periodic roadworthiness tests for vans by making it mandatory as of four years after first registration. This incentive is nullified by making emission tests mandatory from the first year of registration. These two types of tests should be aligned and done for the first time four years after first registration.

Regrettably, discrepancies remain between the testing frequencies of the Member States. While the minimum test frequency may be preferred by a Member State, IRU considers that the flexibility to adjust the frequency to their road safety requirements jeopardises harmonisation and could lead to distortion of competition because the tests will become more costly in Member States with higher frequencies.

IRU calls for:

- Exhaust emissions test for N1 vehicles four years after first registration, to align this with PTIs intervals.
- Weight threshold of 4.25 tonnes instead of 3.5 for N1 ZEVs.
- Greater harmonisation of testing frequencies between Member States to avoid market distortions and ensure a level playing field for operators.

b) New testing requirements should not lead to bottlenecks

IRU warns that the proposal's extensive new testing obligations – the addition of 50 new ADAS, to a total of 63 items to be potentially checked, the suspension and shock absorber testing becoming compulsory rather than remaining optional - may have a

negative impact on commercial road transport operators and Member States. The mandatory presence and inspection of EV charging cables is also problematic, given that one EV charging cable could serve multiple vehicles.

Batteries are one of the most important components of battery-electric vehicles. The new proposal does not foresee an aligned EU-wide approach for assessing battery performance during periodic technical inspections (PTIs), raising concerns on a) how to ensure safe and reliable operations of battery-electric vehicles throughout their lifecycle without imposing unnecessary or overly frequent / premature battery replacements, and causing unnecessary costs or disruptions on vehicle owners and operators, and on b) how to achieve a harmonised implementation of battery-related inspection requirements across Member States avoiding market fragmentation and regulatory confusion.

It should be noted that today, many Member States encounter capacity challenges for organising periodic tests and will have to ensure sufficient capacity and availability of testing centres to meet the new testing requirements within their national territory, avoiding delays, bottlenecks and extra costs for commercial road transport operators.

The emergence of hydrogen-powered vehicles requires specific treatment within the roadworthiness testing framework. Due to the significant safety, training, infrastructure, and insurance implications, IRU recommends that not all PTI centres be required to accommodate hydrogen vehicle testing. Instead, a specialised testing regime, similar to that applied to ADR vehicles, should be adopted.

Enhanced emissions testing cannot be fairly enforced unless fuel quality is guaranteed in parallel. In jurisdictions where fuel quality oversight is lacking, operators may face increased emissions, fuel consumption, and mechanical failures due to substandard fuel.

To carry out these tests efficiently and avoid creating additional bottlenecks, there should be sufficient staff capacity at Member State level.

IRU calls for:

- Member State authorities should ensure adequate training, resource allocation, and availability of testing centres to support the new technical testing requirements introduced in PTIs.
- Establishing an aligned EU-wide approach to:
  - assess battery performance during periodic technical inspections (PTIs),
  - list indicators to identify when low traction batteries' performance negatively impacts the roadworthiness of a BEV from a road safety perspective (to avoid unnecessary or overly frequent battery replacements),
  - ensure a harmonised implementation of battery-related inspection requirements across Member States to avoid regulatory uncertainties.
- A dedicated testing regime for hydrogen vehicles, and stronger fuel quality controls to ensure fair and accurate emissions testing.
- Increased guarantees for better fuel quality.

c) Follow-up on deficiencies should not reduce flexibility for the transport operators

IRU considers that while addressing dangerous deficiencies promptly is essential for road safety, the proposed framework introduces in Article 9 procedural constraints that risk disrupting commercial transport operations. Under the new rules, when a vehicle's roadworthiness is suspended due to dangerous deficiencies, only the authority that initiated the suspension is permitted to issue a new roadworthiness certificate once the issue is resolved. This marks a significant departure from the current regime, which allows rectification and certification either in the Member State of registration or the Member State that requested the suspension, offering operators greater flexibility. Moreover, the proposal fails to specify a timeframe for issuing the new certificate after deficiencies are rectified. Since vehicles with suspended registrations are prohibited

from circulating, this omission could lead to unnecessary delays and operational downtime for transport companies.

IRU calls for:

- Retaining the current flexibility on rectification and testing either in the Member State that requested the suspension or in the Member State of registration and introducing a clear deadline for issuing new roadworthiness certificates once deficiencies are resolved.
- Temporary roadworthiness certificates which have been issued after rectification of deficiencies outside the Member States of registration could be mutually recognised by that Member States until the next mandatory periodic test.

d) Validity of roadworthiness certificates obtained after a temporary suspension

IRU believes that for vehicles of categories M2, M3, N2, N3, O3 and O4 when a registration or a roadworthiness certificate is temporarily suspended - regardless of the reason - any subsequent certification following a successful test should be valid for a full 12 months. While this approach may result in a roadworthiness certificate that is not fully aligned with the original registration date of the vehicle and the corresponding testing frequency, it should be considered acceptable to support the operational flexibility of the operators who proactively maintain their fleets.

For instance, in Ireland, vehicles of categories O3 and O4, can be declared “Off the Road”, using an official platform. However, when returning to service, trailers may undergo a test only to receive a certificate valid for a few weeks or months, rather than the standard 12 months, despite passing the same test as other trailers. This depends on the fact that the date of first registration of a trailer - whether new or imported - remains its immovable due date for the annual roadworthiness test. This rigid system creates challenges for operators whose work is seasonal or project-based, such as during harvest periods, holiday logistics, or summer roadworks.

IRU calls for:

- A full 12-month validity of any roadworthiness certificate obtained following the temporary suspension – regardless of the reason – of the registration or roadworthiness certificate, for vehicles of categories M2, M3, N2, N3, O3 and O4.

e) Crisis situations

IRU welcomes the addition of a provision allowing for extension of the roadworthiness certificate validity in crisis situations, where periodic technical inspections (PTIs) cannot be carried out in a timely manner. The COVID-19 pandemic clearly demonstrated the need for resilient and flexible inspection systems, as temporary closures of test centres severely disrupted commercial road transport operations across the EU. Nevertheless, IRU stresses that vehicle safety must remain a priority and is essential to provide guidance and harmonised procedures to ensure operational resilience and road safety.

IRU calls for:

- Clear criteria and EU-level guidance for extending roadworthiness certificate validity during crises, ensuring safety is not compromised.
- Harmonised contingency protocols to support continuity of commercial transport operations

2. Proposal on technical roadside inspection of the roadworthiness of commercial vehicles

a) Targets

While IRU acknowledges the potential of remote sensing as a pre-screening tool for noise and exhaust emissions, the requirement for Member States to annually screen 30% of the registered fleet seems unfeasible without a phased rollout. Technologies must first be tested under real-life conditions, with clear technical standards, defined

use cases, and agreed error margins, particularly for noise measurement. Inspector training must be mandatory and tailored to diverse vehicle types and technologies.

Similarly, IRU questions the proportionality of the proposed 2% roadside inspection target for light commercial vehicles (N1 category). An intelligence and risk-based approach should be preferred, ensuring inspection efforts reflect national capacities and fleet characteristics. Risk-rating systems should also be harmonised to avoid divergent interpretations of infringements, disproportionate sanctions, inconsistent appeal procedures, and unclear liability frameworks for drivers, transport managers, undertakings, and third parties.

IRU calls for:

- A phased and tested deployment of remote sensing technologies, with clear technical standards and training requirements, coupled with a realistic target for fleet coverage, aligned with Member States' enforcement capacities.
- A reassessment of the 2% RSI target for N1 vehicles to ensure proportionality, and primacy of intelligence-led risk-based approaches to roadside inspections, tailored to national enforcement capacities and fleet characteristics.

b) Follow-up measures following remote sensing

IRU is concerned that the flexibility granted to Member States in deciding whether to undertake follow-up measures after remote sensing of vehicles registered in other Member States may lead to fragmented and inconsistent implementation across the EU. While mandatory notifications between authorities and vehicle holders are foreseen, the lack of harmonised procedures risks disproportionate enforcement, legal uncertainty, and potential discrimination based on nationality of the transport company. IRU urges that follow-up inspections should be limited to clearly defined cases, based on significant exceedance thresholds, to ensure proportionality and consistency. Given the need for a learning and testing phase to assess the maturity and reliability of remote sensing technologies, IRU also questions whether one measurement alone – in the context of an RSI - should trigger further verification.

IRU calls for:

- Clear and harmonised criteria for follow-up inspections based on remote sensing, including limiting follow-up inspections after remote sensing in the context of an RSI to exceptional cases, based on severity and confirmed exceedances.

c) Exchange of data on remote sensing

IRU is concerned that commercial transport operators will not be informed in due time of the outcome of remote sensing screenings, including access to a warning mechanism that allows for a timely rectification.

IRU calls for:

- Clear rules on collection, storage, exchange of remote sensing data, defined responsibilities and timeframes for data retention, mandatory notification and warning system for vehicle owners following remote sensing screenings.

d) Inspection of cargo securing must remain optional

Given the absence of a harmonised EU legal framework on cargo securing, imposing an enforcement obligation would create legal uncertainty and inconsistencies. The only reference, EN 12195-1, is a non-binding European standard from 2004 (revised in 2010), applied inconsistently across Member States. In this context, it is questionable whether the European Commission can legitimately categorise infringements at the EU level without a harmonised legal basis, risking deepening of the legal fragmentation. Commercial transport operators may be compliant in one country but still face penalties in another during cross-border operations. This situation risks creating unfair competition, legal uncertainty for both operators and enforcement authorities. The proposal does not also clarify whether cargo securing inspections should occur during every roadside check or only when deemed necessary. Given the diversity of cargo types and transport modes, a one-size-fits-all inspection approach is not feasible.

IRU strongly advises maintaining the current approach, where cargo securing checks during roadside inspections are optional rather than mandatory.

IRU calls for:

- Maintaining the status quo, with inspections of cargo securing remaining optional.
- Development of harmonised EU rules on cargo securing and a limit on Member States' discretion to go beyond EU standards, to avoid legal fragmentation.

3. Vehicle registration documents and recorded data proposal

a) Harmonisation and standardisation of registration certificates

IRU welcomes the European Commission's efforts to further harmonise and digitalise vehicle registration certificates across the EU. Mutual recognition of physical and mobile formats is a significant improvement. It simplifies vehicle identification in international traffic and streamlines re-registration procedures across borders. While the proposal introduces only minimum EU standards and requirements for categories of data on registration certificates recorded in the national vehicle registers, IRU supports full harmonisation of registration certificates. The interconnectivity of vehicles data via MOVE-HUB facilitates the exchange of information but does not seek to harmonise all aspects of vehicle registration, which still varies depending on the Member States.

IRU calls for:

- Extension of harmonisation efforts beyond minimum standards, aiming for full alignment of registration certificate formats and data categories across Member States.

b) Introduction of mobile registration certificates

IRU fully supports the European Commission's initiative to digitalise vehicle registration certificates through the introduction of mobile formats. This development marks a significant step towards achieving paperless driver cabins and reducing administrative burdens for commercial road transport operators.

Mobile registration certificates will be issued free of charge as electronic attestations of attributes within the European Digital Identity Wallet, in line with Regulation (EU) No 910/2014. Member States will be required to issue only mobile certificates starting four years and one day after the Directive enters into force, while physical certificates will remain available upon explicit request of the applicant. To further digitalise documentation, Member States will be able to add a QR code to a physical certificate in both paper and smart card formats. The introduction of QR codes in physical registration certificates requires in-depth examination, especially on their intended use and methods to ascertain their authenticity.

While supporting the digitalisation of registration certificates, IRU is concerned about potential access issues in cases of limited connectivity or when one of the parties involved in a roadside or periodic technical inspection cannot retrieve the digital format. Appropriate backup measures should be duly considered.

IRU calls for:

- Ensuring that access to registration certificates is granted to all Member States' enforcement authorities, and that appropriate backup measures are in place in case of issues in accessing the digital certificates.

4. Digital exchange of information via MOVE-HUB

IRU welcomes The European Commission's efforts to enhance cross-border data exchange through the MOVE-HUB electronic system. Standardised data formats and real-time access to vehicle documentation, including of trailers and semi-trailers, enabled by interconnected national registers is a positive step that facilitates more effective enforcement and compliance monitoring by competent authorities in all Member States. Further clarity is needed on whether certificates are vehicle- or driver-specific, and how they will be displayed and accessed in practice, also during RSIs. It

is also essential that roadside enforcement officers and PTI centres have guaranteed, real-time access to digital certificates across all EU Member States.

IRU urges the European Commission to ensure that the transition to MOVE-HUB is preceded by a thorough assessment of the functionalities of, and interoperability with, other well-established and proven solutions such as the Internal Market Information System (IMI), the Electronic Freight Transport Information (eFTI), and the Electronic Registers for Road Transport Undertakings (ERRU). Coexistence of multiple databases presents challenges for procedures such as risk-rating, which rely on consistent and comprehensive data, and will have to base their assessment on information coming from a few different sources.

The proposed one-year deadline for Member States to complete this interconnection is overly ambitious, given the complexity of aligning national systems and addressing interoperability challenges. A more realistic implementation period, e.g. two-three years, would allow for a smoother and more effective roll-out.

IRU calls for:

- Guaranteed interconnectedness of digital platforms (e.g. IMI, eFTI, ERRU) for the purpose of the harmonisation of data for risk-rating assessments.
- Comprehensive assessment of existing digital platforms (e.g. IMI, eFTI, ERRU) before transitioning to MOVE-HUB, to ensure interoperability and avoid overlapping or conflicting functionalities.
- A realistic implementation period for Member States to connect to the MOVE-HUB platform of at least two-three years.

5. Issues not addressed by the Package

a) Minimum duration of RSIs, PTIs, and vehicle detention time.

IRU stresses the need to minimise the duration of RSIs, particularly to avoid prolonged checks for passenger transport, and supports practical solutions, such as conducting inspections when passengers are not on board (e.g. at terminals) and setting a maximum vehicle detention time. Additionally, a common control document valid for 48 hours or more could prevent redundant inspections and improve efficiency. It is also essential to minimise operational downtime for vehicles undergoing PTIs, and RSIs. This is particularly critical in commercial road transport, where time-sensitive logistics and fleet efficiency may be directly affected by inspection-related delays.

b) Availability of RSI inspection areas

IRU urges that it is essential to ensure that RSI facilities are safe, well-equipped, and strategically located, particularly along the TEN-T network to minimise time losses, especially given expanded inspection obligations and increased use of remote technologies. The availability or adequacy of RSI inspection areas should be addressed by the proposal.

c) Primacy of periodic technical inspections (PTI)

IRU reiterates that PTIs conducted at test centres should remain the main tool for ensuring vehicle roadworthiness, with RSIs serving only as a complementary measure, not a substitute. Prioritising RSIs over PTIs risks distorting competition and undermining the structured, professional inspection regime already in place.

IRU calls for:

- Introduction of a maximum vehicle detention time during RSIs and the use of a common control document valid for at least 48 hours to avoid redundant checks.
- Investment in RSI infrastructure, ensuring safe, well-equipped, and strategically located inspection areas, particularly along the TEN-T network.
- Reaffirmation of PTIs' primacy as the main tool for roadworthiness compliance.

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